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## **U.S. Department of Justice**

United States Attorney Eastern District of New York

SA/SDD F. #2012R01574 271 Cadman Plaza East Brooklyn, New York 11201

March 22, 2016

## By ECF

Honorable Lois Bloom United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Ahmed, et al.

Criminal No. 12-661 (S2) (JG) (LB)

## Dear Judge Bloom:

The government writes to inform you that a member of the media has made a request to our Office to provide a copy of a deposition transcript that was taken in connection with the above-referenced case and filed under seal pursuant to a protective order because it contained sensitive information that pertains to ongoing investigations. See United States v. Doe, 63 F.3d 121, 128 (2d Cir. 1995); United States v. Haller, 837 F.2d 84, 87 (2d Cir. 1988). Mindful of the presumption of openness in court proceedings and the public's qualified right to access, and in response to the specific request in this case, the government has prepared a redacted version of the transcript, which may be provided to the requestor while still protecting the sensitive information. Absent any objection from the Court or the parties, the government will provide a copy of the transcript to the requestor by March 25, 2016.

Respectfully submitted,

ROBERT L. CAPERS United States Attorney

By: /s/

Seth D. DuCharme Assistant U.S. Attorney (718) 254-6021

cc: All counsel of record, via ECF